

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
Alexandria Division**

KRISTEN FREDRICKS, JOSEPH V. CUFFARI,)	
JOSEPH E. GANGLOFF, and JAMES M. READ)	
)	
Plaintiffs,)	
)	
v.)	
)	No. 1:23-cv-442 (RDA/LRV)
COUNCIL OF THE INSPECTORS GENERAL)	
ON INTEGRITY AND EFFICIENCY (“CIGIE”))	
INTEGRITY COMMITTEE (“IC”); KEVIN H.)	
WINTERS, Chairman, IC, in his official capacity;)	
ROBERT P. STORCH, Vice-Chairman, IC, in his)	
official capacity; GAIL S. ENNIS, Member, IC, in)	
her official capacity; KIMBERLY A. HOWELL,)	
Member, IC, in her official capacity; DALE A.)	
CHRISTOPHER, Deputy Director for Compliance,)	
U.S. Office of Government Ethics, in his official)	
capacity; TOM MONHEIM, Member, IC, in his)	
official capacity; CATHERINE S. BRUNO, Member,)	
IC, in her official capacity; ALLISON LERNER,)	
Inspector General, National Science Foundation,)	
Former Chair and Vice Chair, CIGIE, in her official)	
capacity,)	
)	
Defendants.)	
)	

MOTION TO DISMISS

Pursuant to Federal Rule of Civil Procedure 12(b)(1) and 12(b)(6), Defendants, through the undersigned counsel, hereby respectfully file this motion to dismiss Plaintiffs’ Complaint. The grounds for this motion are more fully explained in the memorandum of law that has been simultaneously filed with the motion.

Dated: June 23, 2023

Respectfully submitted,

BRIAN M. BOYNTON
Principal Deputy Assistant Attorney General

By:

JESSICA D. ABER
UNITED STATES ATTORNEY

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Office of the United States Attorney

/s/
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